

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft permit No. V-05-013

Eagle Industries Inc.

601 Double Spring Road, Bowling Green, Kentucky

February 28, 2005

REVIEWER: Sajjad Quabili

Plant I.D. 21-227-00096

A. I. Number: 4107

Activity Number: APE20050001

SOURCE DESCRIPTION:

Eagle Industries Inc. operates a wood furniture manufacturing plant at Bowling Green, Kentucky. The source applied for the renewal of their Title V/Synthetic Minor permit. The facility is a major source for VOC and HAP emissions.

PERMITTING BACKGROUND:

Eagle is holding a Title V/Synthetic Minor permit. Currently, the allowable VOC emission limit is less than or equal to 250 tons per year for Emission point #1 located at 601 Double Spring Road. The allowable VOC emission limit is less than 249 ton per year for Emission Point #2 and #3 (Curio and D. C Finishing Lines). The Division has reduced the allowable VOC emission limit to 225 tons per year for each emission point.

APPLICABLE REGULATIONS:

Eagle Industries is subject to the following regulations for their wood furniture manufacturing operations:

- A. 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2 (Compliance date: December 7, 1998).
- B. 401 KAR 59:010, New process Operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.
- C. 401KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.
- D. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

E. The requirement for compliance assurance monitoring (40 CFR 64) is applicable to pollutant-specific emission unit (PESU) must meet the following three applicability criteria:

1. Is located in a major source, and
2. Is subject to emission limitations and has a control device to meet that limit, and
3. Has pre-control emissions greater than major source threshold (> 100 ton per year for criteria pollutants).

Eagle Industries has no above mentioned pollutant specific emission unit. Therefore, CAM is not applicable to Eagle Industries.

PERIODIC MONITORING:

The Division is requiring Eagle Industries to keep daily records of usage of sealers, stains, coatings and thinners at each of the spraying booths and to summarize those records at the end of each month. The source shall also keep records of the monthly and twelve-month rolling total for VOC emissions at the plant.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.